

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

-v- : -----

NOTICE OF MOTION

JOSHUA ADAM SCHULTE, : -----

S2 17 Cr. 548 (PAC)

Defendant. : -----

X

PLEASE TAKE NOTICE that the defendant Joshua Adam Schulte, by and through his counsel, moves this Court, pursuant to Fed. R. Crim. P. 12(b)(3)(B)(v) and the First and Fifth Amendments of the Constitution, upon the accompanying memorandum of law, and all prior proceedings herein, for an order dismissing Counts One, Two, ,Three, Four, and Six of the Second Superseding Indictment on the ground that the Espionage Act, 18 U.S.C. § 793, and the federal larceny statute, 18 U.S.C. § 641, are unconstitutionally overbroad and void for vagueness.

Dated: New York, New York
November 4, 2019

Respectfully submitted,

/s/ Edward S. Zas

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